#### REMARKS

### I. <u>Introduction</u>

In response to the Office Action dated October 4, 2007, claims 1, 7 and 13 have been amended. Claims 1-18 remain in the application. Re-examination and re-consideration of the application, as amended, is requested.

### II. Statutory Subject Matter Rejection

In paragraphs (2)-(3) of the Office Action, claims 13-18 were rejected under 35 U.S.C. §101 as being directed to non-statutory subject matter.

Applicants' attorney has amended the claims as indicated above to overcome these rejections.

However, should issues still remain in this regard, Applicants' attorney requests that the Examiner indicate how the rejection can be overcome, in accordance with the directives of the Interim Guidelines for Examination of Patent Applications for Patent Subject Matter Eligibility (Interim Guidelines) II. Specifically, should it be necessary, the Applicants' attorney requests that the Examiner identify features of the invention that would render the claimed subject matter statutory if recited in the claim. See Interim Guidelines IV.B.

## III. Prior Art Rejections

In paragraphs (4)-(5) of the Office Action, claims 1-3, 5 and 7-18 were rejected under 35 U.S.C. §102(b) as being anticipated by U.S. Patent No. 6,466,953 (Bonney). In paragraph (5) of the Office Action, claims 4 and 6 were rejected under 35 U.S.C. §103(a) as being unpatentable over Bonney.

Applicants' attorney respectfully traverse these rejections.

Independent claims 1, 7 and 13 have been amended to better distinguish over the reference. Specifically, independent claims 1, 7, and 13 now recite an invention directed to a graphics program operated by a computer, wherein one or more functions of a Sheet Set Manager are performed in the graphics program. Specifically, the Sheet Set Manager manages a one or more Sheet Sets, each of the Sheet Sets comprises a collection of zero or more Sheets and Subsets of the Sheets, each of the Sheets comprises a drawing, layout or view. The Sheet Set Manager also allows users to place callouts on the Sheets directly from a window of the Sheet Set Manager showing a logical structure for the Sheet Sets in visual form. Bonney does not teach or suggest this combination of limitations.

Nonetheless, the Office Action asserts the following:

Claims 1-3, 5, 7-18 are rejected under 35 U.S.C. 102(b) as being unpatentable over Bonney et al. ("Bonney", US 6,466,953 B1).

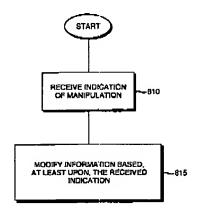
Claim 1: Bonney teach, A method for operating a graphics program in a computer (Fig. 8), comprising: performing a Sheet Set Manager function in the graphics program (Fig. 4), wherein the Sheet Set Manager manages a one or more Sheet Sets (organizational and management of hierarchical relationships sheets, col 1 lines 10-14), each of the Sheet Sets comprises a collection of zero or more Sheets and Subsets of the Sheets, each of the Sheets comprises a drawing, layout or view (generates objects of the drawing sheets, col 3/4 lines 65-7 and Fig. 2), and the Sheet Set Manager allows users to place callours on the Sheets directly from the window (a user of a CAD application draws icons on a display device, col 5 lines 4-11 and Fig. 2).

The portions of Bonney cited by the Office Action are reproduced below:

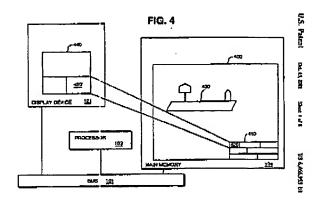
# Bonney: Fig. 8

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FIG. 8



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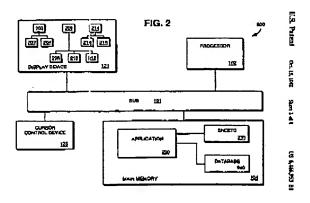
## Bonney: col. 1. Jines 10-14

The present invention relates to management of computer aided design (CAD) drawings. More particularly, the present invention relates to organization and management of hierarchical relationships sheets included within the CAD drawings.

### Bonney: col. 3/4, lines 65-7

FIG. 2 is one embodiment of a computer system executing a CAD application program that generates objects of the drawing sheets of a design with a hierarchical relationship. While described in terms of computer-aided design (CAD) software, the present invention is not limited to use with CAD applications and files. For example, the present invention can be used to manage and organize inventories. Additionally, while described in terms of "sheets," the present invention is not limited to use with CAD sheets, and can be used with other types of objects.

### Bonney: Fig. 2



#### Bonney: col. 5, lines 4-11

In one embodiment, a user of a CAD application "draws" icons on a display device to represent sheets stoted in memory or on a storage device. The icons can be drawn, for example, in the same manner as devices and components are drawn using the CAD application. The example of FIG. 3a describes icons in terms of boxes for simplicity; however, any icon, whether simple or complex can be used. Alternatively, a library of predefined icons can be provided so that the user is not required to draw icons.

Applicants' attorney respectfully submits that these portions of Bonney do not teach or suggest the combination of limitations found in Applicants' independent claims.

For example, the assertion by the Office Action that the limitations "the Sheet Set Manager allows users to place callouts on the Sheets directly from the window" is shown in Bonney, at col. 5, lines 4-11 and Fig. 2, by a user of a CAD application drawing icons on a display device is erroneous.

Instead, these portions of Bonney merely describe a user drawing icons on a display device to represent sheets, not callouts. Moreover, nothing in these portions of Bonney refer to users placing callouts on sheets directly from a window of the Sheet Set Manager showing a logical structure for the Sheet Sets in visual form. Consequently, Bonney does not teach or suggest these limitations.

Thus, Applicants' attorney submits that independent claims 1, 7 and 13 are allowable over Bonney. Further, dependent claims 2-6, 8-12 and 14-18 are submitted to be allowable over Bonney the same manner, because they are dependent on independent claims 1, 7 and 13, respectively, and thus contain all the limitations of the independent claims. In addition, dependent claims 2-6, 8-12 and 14-18 recite additional novel elements not shown by Bonney.

### IV. Conclusion

In view of the above, it is submitted that this application is now in good order for allowance and such allowance is respectfully solicited.

Should the Examiner believe minor matters still remain that can be resolved in a telephone interview, the Examiner is urged to call Applicants' undersigned attorney.

Respectfully submitted,

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